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                      IN THE UNITED STATES DISTRICT COURT
                            FOR THE DISTRICT OF NEVADA
11
    KMI ZEOLITE, INC.; and ROBERT E. FORD,
12
13
                 Plaintiffs/Counterclaim Defendants
                                                         ) No. 2:15-cv-2038-JCM-VCF
14
                        v.
15
    UNITED STATES DEPARTMENT OF THE
16
    INTERIOR; et al.,
17
                 Defendants/Counterclaim Plaintiffs
18
    ABC RECYCLING INDUSTRIES, LLC,
19
    a Nevada Limited Liability Company,
                                                        )No. 2:16-cv-46-JCM-VCF
20
                 Plaintiff,
21
                                                           PLAINTIFF/COUNTERCLAIM
                                                           DEFENDANT KMI ZEOLITE'S
                        v.
22
                                                           MOTION TO WITHDRAW
     AMERICAN BORATE COMPANY, et al.
                                                           ANDREW TAYLOR AS
23
                                                           COUNSEL
24
                 Defendants.
25
           COMES NOW Plaintiff/Counterclaim Defendant KMI Zeolite Inc., by and
26
    through its undersigned counsel, Karen Budd-Falen, Esq., of the Budd-Falen Law
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Offices, LLC, and respectfully files this motion for an order allowing Andrew Taylor to withdraw as counsel for Plaintiff/Counterclaim Defendant KMI Zeolite Inc.

In support of this motion, Plaintiff states the following:

- Andrew Taylor is no longer associated with the firm of Budd-Falen
 Law Offices, LLC.
- 2. Karen Budd-Falen of Budd-Falen Law Offices, LLC and Gregory A.

 Miles of Royal and Miles, LLP will continue as counsel of record for Plaintiff/

 Counterclaim Defendant KMI Zeolite Inc. in this matter.
- 3. Plaintiff/Counterclaim Defendant KMI Zeolite and opposing counsel have been notified of Andrew Taylor's departure.

WHEREFORE, for the reasons set forth above, Plaintiff respectfully requests that the Court enter an order allowing Andrew Taylor to withdraw as counsel for Plaintiff/Counterclaim Defendant KMI Zeolite Inc. in this matter.

RESPECTFULLY SUBMITTED this 29th day of June, 2017.

/s/Karen Budd-Falen

Karen Budd-Falen (*Pro Hac Vice*) BUDD-FALEN LAW OFFICES, LLC 300 East 18th Street Post Office Box 346 Cheyenne, WY 82003 (307)632-5105 Telephone (307)637-3891 Telefax karen@buddfalen.com

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June, 2017, I filed through the United States District Court ECF System the foregoing document to be served by CM/ECF electronic filing on the following:

CM/ECF All Counsel of Record

> <u>/s/Karen Budd-Falen</u> Karen Budd-Falen (*Pro Hac Vice*)

1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF NEVADA 3 KMI ZEOLITE, INC.; and ROBERT E. FORD, 4 Plaintiffs/Counterclaim Defendants 5) No. 2:15-cv-2038-JCM-VCF v. 6 UNITED STATES DEPARTMENT OF THE 7 INTERIOR; et al., 8 **Defendants/Counterclaim Plaintiffs** 9 ABC RECYCLING INDUSTRIES, LLC, 10 a Nevada Limited Liability Company,)No. 2:16-cv-46-JCM-VCF 11 Plaintiff, 12 **ORDER GRANTING** MOTION TO WITHDRAW v. 13 14 AMERICAN BORATE COMPANY, et al. 15 Defendants. 16 The Court having reviewed Plaintiff/Counterclaim Defendant KMI Zeolite's 17 18 Motion to Withdraw Andrew Taylor as Counsel, and finding that good cause exists 19 therefor, 20 **IT IS HEREBY ORDERED** by the Court that the motion is **GRANTED**. 21 Andrew Taylor is withdrawn as counsel for Plaintiff/Counterclaim Defendant KMI 22 Zeolite. Karen Budd-Falen and Greg Miles shall continue to represent Plaintiff/ 23 24 Counterclaim Defendant KMI Zeolite in the above-entitled matter. 25 DATED this ^{7th} day of ^{July} . 2017. 26 27 Cam Ferenbach United States Magistrate Judge 28